

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself and  
all others similarly situated,

Plaintiff,

**vs.**

NORDSEC LTD., NORDSEC B.V., NORDVPN  
S.A., NORD SECURITY INC., and TEFINCOM  
S.A. d/b/a NORDVPN,

Defendants.

**CASE NO. 3:24-CV-00277-KDB-DCK**

**DECLARATION OF RUTA GORELCIONKIENE IN SUPPORT OF DEFENDANT  
NORDSEC B.V.'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Ruta Gorelcionkiene declares as follows:

1. I am the director at NordSec B.V. I am competent to testify and make this declaration based on my personal knowledge.
2. I understand that this litigation involves claims that Nordvpn S.A. charged a customer in North Carolina for a recurring subscription to retail consumer VPN and related services, allegedly without the customer's consent. I further understand that the customer first subscribed to NordVPN and related services in August 2023.
3. NordSec B.V is a private limited liability company organized under the laws of the Netherlands, and its principal place of business is Amsterdam, the Netherlands. NordSec B.V. is a holding company that owns the intellectual property of the Nord brand. NordSec B.V. is not involved in providing VPN or related to services to any customers in the United States or elsewhere, and it was not involved in providing any such services in or before 2023. NordSec B.V. did not charge any customer in the United States, including Plaintiff, for any such services at any time, and it did not enter into any contract with Plaintiff.

4. NordSec B.V. maintains its own funds in an independent account sufficient to operate its business.

5. NordSec B.V. is organized and governed by its own articles of association and other corporate statutory documents, as a stand-alone entity.

6. NordSec B.V. is managed by its own board and holds its own shareholder meetings, as required.

7. NordSec B.V. accurately maintains its own business records, including financial records, minutes from shareholder meetings, corporate tax filings, and other corporate documents, such as the articles of association and corporate resolutions.

8. NordSec B.V. does not share officers or directors with the other Defendants.

9. NordSec B.V. does not have offices, employees, or contractors in North Carolina.

10. NordSec B.V. is not a sales entity and does not conduct any client-facing activities.

11. NordSec B.V. has never purchased or used advertising space or held an event of any kind in North Carolina for retail consumer VPN or related services.

12. NordSec B.V. does not solicit business in North Carolina and has no long-term business activities in North Carolina.

13. NordSec B.V. has never made in-person contact with any resident of North Carolina.

14. NordSec B.V. does not ship products into North Carolina.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 27th day of June, 2024.

*Ruta Gorelcionkiene*

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Director

Ruta Gorelcionkiene